

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EASTERN PROFIT CORPORATION)	
LIMITED,)	
)	
Plaintiff,)	Case No. 18-CV-2185 (LJL)
v.)	
)	
STRATEGIC VISION US, LLC,)	
)	
Defendant.)	
)	
)	
)	

**DECLARATION OF JOANNA J. CLINE IN SUPPORT OF PLAINTIFF EASTERN
PROFIT CORPORATION LIMITED BILL OF COSTS**

I, Joanna J. Cline, declare:

1. I am an attorney at Troutman Pepper Hamilton Sanders LLP, and counsel of record for Eastern Profit Corporation Limited (“Eastern”) in this litigation. I am admitted to practice in Delaware, New Jersey, and Pennsylvania, and I am admitted to this Court *pro hac vice*.
2. I submit this declaration in support of Eastern’s Bill of Costs.
3. In the above-captioned case, Eastern asserted claims for breach of contract, a declaratory judgment, and unjust enrichment. Strategic Vision US, LLC (“Strategic”) asserted counterclaims for breach of contract and fraudulent inducement.
4. The Court held an in-person bench trial, overseen by Judge Liman, which commenced on April 19, 2021, and concluded on April 22, 2021.

5. The parties delivered their closing statements to the Court, remotely, on April 30, 2021.

6. The Court entered judgment in favor of Eastern and against Strategic on Count III (Declaratory Judgment) of Eastern's Second Amended Complaint, Count I (Breach of Contract) of Strategic's Counterclaims, and Count II (Fraud) of Strategic's Counterclaims. Dkt. No. 377.

7. Eastern's Bill of Costs totals \$23,616.47.

8. Attached as **Exhibit A** are true and correct copies of invoices for original trial transcripts, taxable under L. R. 54.1(c)(1). These are the costs of such transcripts paid by Eastern (and do not include the costs of such transcripts paid by Strategic or other parties). These transcripts were necessary for trial in this case and were used to prepare witnesses and to prepare for the presentation of evidence. These transcripts were not obtained solely for the convenience of counsel.

EXHIBIT A. FEES OF THE COURT REPORTER FOR ALL OR ANY PART OF THE TRIAL TRANSCRIPTS NECESSARILY OBTAINED FOR USE IN THE CASE (taxable pursuant to Local Rule 54.1(c)(1))		
Date	Invoice Number / Description	Total Costs
4/19/2021 Transcript	0532383-IN	\$1,028.16
4/20/2021 Transcript	0532382-IN	\$1,110.78
4/21/2021 Transcript	0532381-IN	\$830.79
4/22/2021 Transcript	0532380-IN	\$766.53
4/30/2021 Transcript	0532633-IN	\$367.20
Fees paid to Southern District Court Reporters, Inc. for the cost of original trial transcripts necessarily obtained for use in this case.		
REQUESTED SUBTOTAL COST(S):		\$4,103.46

9. Attached as **Exhibit B** are true and correct copies of invoices for original trial deposition transcripts, taxable under L. R. 54.1(c)(2). These are the costs of such transcripts paid by Eastern (and do not include the costs of such transcripts paid by Strategic or other parties).

These transcripts include deposition transcripts for the following witnesses who testified live at trial and whose depositions were used at trial or were otherwise reasonably necessary to the parties at the time they were taken: Mr. William Gertz (fact witness), Ms. Sasha Gong (fact witness), Chunguang Han (fact witness), Lianchao Han (fact witness), Karin Maistrello (fact witness), J. Michael Waller (fact and 30(b)(6) witness), French Wallop (fact and 30(b)(6) witness), Yvette Wang (fact witness), and Guo Wengui (fact witness).

EXHIBIT B. FEES OF THE COURT REPORTER FOR ALL OR ANY PART OF THE DEPOSITION TRANSCRIPTS NECESSARILY OBTAINED FOR USE IN THE CASE (taxable pursuant to Local Rule 54.1(c)(2))				
Deponent	Date	Vendor	Invoice No.	Total Invoice
William Gertz	10/15/2019	Atkinson-Baker, Inc.	AD07998 AB	\$545.20
William Gertz	10/15/2019	Atkinson-Baker, Inc.	1AED3	\$160.00
Sasha Gong	11/26/2019	Alaris Litigation Services	115200	\$939.80
Chunguang Han	11/11/2019	Atkinson-Baker, Inc.	AD0B4F6 AB	\$673.05
Lianchao Han	8/28/2019	Atkinson-Baker, Inc.	1ADE2 B	\$335.00
Karin Maistrello	8/23/2019	Atkinson-Baker, Inc.	1B108 B	\$135.00
J. Michael Waller	2/8/2019	Huseby Inc.	556705	\$1,464.97
J. Michael Waller (30(b)(6))	11/19/2019	Veritext, LLC	NY4071791	\$1,696.44
J. Michael Waller (30(b)(6))	11/19/2019	Veritext, LLC	NY4095725	\$1,258.75
French Wallop	2/12/2019	Huseby Inc.	557949	\$2,369.48
French Wallop (30(b)(6))	11/19/2019	Veritext, LLC	NY4071791	\$1,037.43
French Wallop (30(b)(6))	11/19/2019	Veritext, LLC	NY4095725	\$1,475.75
Yvette Wang	10/30/2019	Atkinson-Baker, Inc.	AD0ABD6 AB	\$1,602.25
Yvette Wang	10/30/2019	Atkinson-Baker, Inc.	1B778	\$322.50
Guo Wengui	8/2/2019	Atkinson-Baker, Inc.	1AEA2 B	\$992.50
Guo Wengui	12/4/2019	Atkinson-Baker, Inc.	AD0BC41 AB	\$582.00
Guo Wengui	12/4/2019	Atkinson-Baker, Inc.	1BA29 B	\$222.50
REQUESTED SUBTOTAL COST(S):				\$15,812.62

10. Attached as **Exhibit C** are true and correct copies of invoices for interpretation costs associated with witnesses presented in connection with Eastern's claims as well as excerpts of trial transcripts on each day these witnesses testified with interpretation assistance, taxable under L. R. 54.1(c)(4). The fee of each witness involved is taxable pursuant to L. R. 54.1(c)(3).

EXHIBIT C. WITNESS FEES (INTERPRETATION) (taxable pursuant to Local Rule 54.1(c)(4))				
Witness Name	Date	Vendor	Invoice No.	Total Invoice
Han Chunguang	4/20/2021 – 4/22/2021	Una Wilkinson	GK06521	\$2,972.42
Kwok Ho Wan				
Guo Wengui				
REQUESTED SUBTOTAL COST(S):				\$2,972.42

11. Attached as **Exhibit D** are true and correct copies of invoices for exemplification and copies of exhibits for use at trial, taxable under L. R. 54.1(c)(5). I declare that the following are entries from Reliable Inc. for the preparation of demonstratives for use during trial or a support person in the courtroom to display the exhibits or demonstratives during the trial relating to Eastern's claims.

EXHIBIT D. FEES FOR EXEMPLIFICATION AND COPIES OF PAPERS NECESSARILY OBTAINED FOR USE IN THE CASE (taxable pursuant to Local Rule 54.1(c)(5))				
Date	Vendor	Description	Invoice No.	Total Costs
10/8/2020	Reliable Inc.	Three copies of all deposition transcripts used at trial	PH217415	\$317.97
REQUESTED SUBTOTAL COST(S):				\$317.97

12. Attached as **Exhibit E** are true and correct copies of invoices for fees of the clerk and miscellaneous fees, taxable under L. R. 54.1(c)(10).

**EXHIBIT E. DOCKET AND MISCELLANEOUS FEES
(taxable pursuant to Local Rule 54.1(c)(10))**

Date	Docket No.	Description	Total Costs
3/12/2018	19	Filing fee for Complaint against Strategic Vision US LLC (originally filed under seal); refiled on 8/9/2018 as Docket No. 19	\$400.00
1/9/2020	240	Pacer fees for obtaining copies of letters filed by Eastern Profit Corporation	\$10.00
REQUESTED SUBTOTAL COST(S):			\$410.00

Dated: August 13, 2021

Respectfully submitted,

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By:



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